



patient powered medicine

Data Privacy Policy

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Patient Powered Medicine Ltd. (“PPM”) is committed to protecting and respecting your privacy. This policy sets out the basis, under applicable data protection law (including the General Data Protection Regulation (EU 2016/679), on which we will process any personal data we collect from you.

PPM is registered with the Information Commissioner.

OUR PROCESSING OF PERSONAL DATA

In the normal course of our business we collect and process data in respect of:

- survey respondents and people taking part in focus interviews (“Survey Recipients”), who may be either service users or members of staff.

When we refer to “personal data” in this policy, we mean any information relating to you from or in relation to which

you may be identified (directly or indirectly). This might include, for instance, your contact details, your biographical details, online identifiers, and factors specific to your physical, mental, economic, cultural or social identity. Your personal data may also include any comments or opinions made by you or about you.

Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it. By taking part in PPM activities you are accepting and consenting to the activities and data usage as described in this policy.

OUR STATUS AND RESPONSIBILITIES

We are the data controller in respect of your personal data.

We are also the data controller in respect of contact information for each client contact which we hold for account and contract management purposes.

All data from surveys and focus interviews is rigorously anonymised at source in accordance with the Information Commissioner's Code of Practice on Anonymisation, which can be read here:

<https://ico.org.uk/media/1061/anonymisation-code.pdf>

INFORMATION WE COLLECT ABOUT YOU

- For Survey Recipients, views you provide to us about you
- If you contact or correspond with us (for example, using any support function made available by us) and we may

keep a record of that correspondence (either directly or through our service providers)

- any comments, opinions and/or feedback you provide to us
- We may also receive further personal data relevant to you which is publicly available, such as Public Health data, but *none of this data is ever personally identifiable as relating to you.*

HOW WE USE YOUR PERSONAL DATA, AND OUR LEGAL BASIS FOR DOING SO

Please note that we are permitted to collect, use, disclose and/or otherwise process any information other than data which is personally identifiable as relating to you.

We will never contact you for promotional or marketing purposes, such as to inform you of new products or services that we offer, unless you specifically consent to this at the time you provide your details to us.

We may use your personal data to deal with any enquiries, correspondence, concerns or complaints you have raised, or in the general administration of our engagement with you. In relation to the above uses, we shall process your personal data on the legal basis that it is necessary for the purposes of our legitimate interests, including: to enable us to perform our contractual obligations, to maintain the security of our computer systems, to improve the user experience, to protect and defend our legal rights, for troubleshooting, and for data analysis.

Please also note:

- Data collected from you may be used by us in an aggregated and anonymised form for statistical and benchmarking purposes including enabling comparisons.

DISCLOSURE OF YOUR INFORMATION

We may share fully anonymised data where necessary or desirable to do so.

We require all third parties and all other companies to protect your personal data in line with our policies.

Feedback and comments provided by you during engagement activities are collated and conveyed to our clients in an aggregated or otherwise anonymised form. As such, your anonymity as a Survey Recipient is protected by default. Please also note that we merely report the feedback and comments and do not undertake any investigation or assessment into their veracity or legality.

We will not disclose your personal data to any third parties for any other purpose unless we have a legal right or obligation to do so.

SECURITY OF INFORMATION

We maintain appropriate technical and organisational measures to ensure that an appropriate level of security in respect of all personal data we process. Unfortunately, the transmission of information via the internet is not completely secure.

Once we have received your information, we will use strict procedures before or during the anonymisation process to prevent unauthorised access or inadvertent disclosure, which may include two factor authentication and end-to-end encryption.

YOUR CONSENT

Where consent is required for our use of your personal data, by ticking the appropriate consent box or otherwise communicating your consent to us (whether by phone, email or other means), you consent to our use of that personal data as set out in this policy.

RETAINING YOUR INFORMATION

We will not store your personal data for longer than is reasonably necessary to use it in accordance with this policy or with our legal rights and obligations. For the avoidance of doubt, aggregated and anonymised data and any information other than personal data can be stored indefinitely.

YOUR RIGHTS

You have the following rights in regards to your personal information:

- **Access.** You have the right to access information about the personal data we hold about you. We reserve the right to charge a reasonable fee in response to unreasonable or repetitive requests, or requests for further copies of the same information.

- Right to object to processing. You have the right to object to processing of your personal data where that processing is being undertaken by us on the basis of our (or a third party's) legitimate interest. In such a case we are required to cease processing your data unless we can demonstrate compelling grounds which override your objection. You also have the right to object at any time to the processing by us of your personal data for direct marketing purposes.
- Rectification. You have the right to request that we rectify any inaccurate personal data that we hold about you.
- Erasure. You have the right to request that we erase any personal data that we hold about you, based on one of a number of grounds, including the withdrawal of your consent (where our processing of that data is undertaken on the basis of your consent), or if you object to our continued processing (as mentioned above). This right does not extend to information which is not personal data. Please also note that it is likely to be necessary for us to retain your personal data for the purposes of assessing and verifying data that is submitted and/or held on the Platform, and your rights under applicable law to request erasure may be limited accordingly. We also reserve the right to retain your personal data in an anonymised form for statistical and benchmarking purposes.

If for any reason you are not happy with the way that we have handled your personal data, you also have the right to make a complaint to the relevant supervisory authority in

your country. In the UK, the relevant authority is the Information Commissioner's Office.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy will be posted on this page and where appropriate may be notified to you by e-mail.